

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF TENNESSEE

UNITED STATES OF AMERICA)	
Plaintiff,)	
)	
vs.)	No. 3:16-CR-20
)	(Collier/Guyton)
MARK HAZELWOOD et al.)	
Defendant.)	

MOTION REQUESTING MODIFICATION OF
TERMS OF RELEASE

Mark Hazelwood, through counsel, moves this Court to modify the terms of his release to substitute his third-party custodian to permit Mrs. Hazelwood to travel on March 24-30, 2020.

I. FACTUAL BACKGROUND

This Court has granted Mr. Hazelwood's numerous prior requests to have substitute third-party custodians step in during his wife's travel.

During each previous modification to Mr. Hazelwood's conditions, he has scrupulously abided each and every instruction from the Probation Office. We again ask the Court to modify Mr. Hazelwood's bail to permit a substitute third-party custodian while Mrs. Hazelwood travels.

Specifically, we request that Mrs. Hazelwood's sister Virginia Adcock be allowed to step in as third-party custodian from March 24-30, 2020.

II. MODIFICATION REQUEST

A. March 24-30, 2020

Mrs. Hazelwood is scheduled to travel out of state from March 24-30, 2020. To facilitate her travel, Virginia Adcock, her sister, has agreed to step in as third-party custodian. She will be informed of her duties and will sign the bond conditions.

Counsel for the government was consulted and advised that the government defers to the discretion of the Court. I have also spoken to Pretrial Services who defers to the Court.

WHEREFORE, Mr. Hazelwood requests that this Honorable Court enter an Order modifying the conditions of his release allowing him to substitute his third-party custodian from March 24-30, 2020.

DATED: Knoxville, Tennessee
March 3, 2020

Respectfully submitted,

s/ Bradley L. Henry
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CERTIFICATE OF SERVICE

I hereby certify that, on March 3, 2020, a true and correct copy of the foregoing document was filed on CM/ECF with the U.S. District Court for the Eastern District of Tennessee. Notice of this filing was served on all CM/ECF parties.

/s/ Bradley L. Henry